IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

U.S. ASIA GLOBAL, INC.
Plaintiff,
vs. **Case No. 1:20-cv-05783**
GLOBAL GEEKS, INC.
Defendants.

PLAINTIFF'S SUBMISSION
RESPONSIVE TO THE COURT'S TEXT ORDER D.E. 19

COMES NOW, Plaintiff, U.S. Asia Global, Inc. ("USAG"), by and through the undersigned Counsel of Record, and submits the following in response to the Court's Text Order Referenced at D.E. 19.

1. Despite the allegations asserted by Defendant Global Geeks, Inc. ("Global Geeks") in defense of its conduct, the subject KN95 masks procured, imported, and delivered to Global Geeks by USAG are KN95 masks manufactured by a duly registered FDA facility authorized to produce KN95 Protective Masks. A copy of the FDA Registration and Device Listing for the KN95 masks delivered by USAG to Global Geeks is attached hereto and incorporated herein as **Exhibit A**.

2. Notwithstanding Defendant's unfounded misrepresentation challenging the authenticity of this FDA registered product, if the Court prefers, USAG will immediately begin adding the following language to all Invoices and Purchase Orders:

WARNING: Due to COVID-19 and the shortage of personal protective equipment ("PPE") in the United States, counterfeit PPE is being sold as authentic PPE. Buyers of PPE in general, and N95 and KN95 masks in particular, are urged to exercise caution and take steps to verify the origin and quality of PPE before purchasing. While USAsia Global continues to do everything it can

to ensure the authenticity of all PPE it distributes, counterfeit claims have been made against USAsia Global concerning imported and distributed KN95 masks. USAsia Global's investigation into these claims is ongoing. Please make sure that you request and receive a U.S. Food and Drug Administration (FDA) Certification for any masks being purchased.

DATED: May 20, 2020.

Respectfully submitted,

GLANKLER BROWN, PLLC

By: _____

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By: */s/ Aleena Sorathia*

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Attorneys for Plaintiff, U.S. Asia Global, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing Submission on the Court's ECF Site. The submission is available for viewing and downloading on the Court's ECF system.

AHMAD ZAFFARESE, LLC

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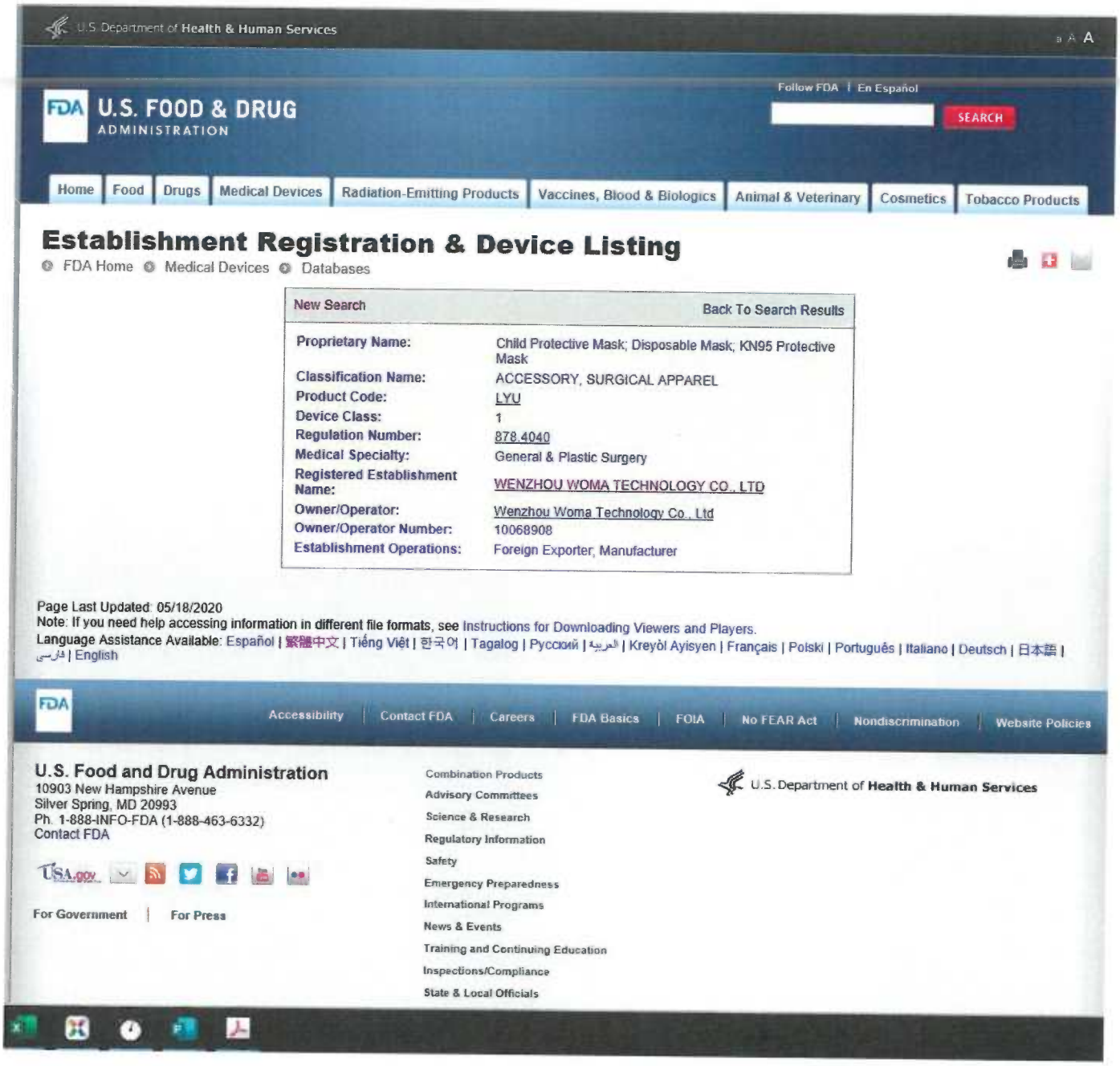
Dated: May 20, 2020

Exhibit A



U.S. Department of Health & Human Services

A A A

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Proprietary Name:	Child Protective Mask; Disposable Mask; KN95 Protective Mask
Classification Name:	ACCESSORY, SURGICAL APPAREL
Product Code:	LYU
Device Class:	1
Regulation Number:	878.4040
Medical Specialty:	General & Plastic Surgery
Registered Establishment Name:	WENZHOU WOMA TECHNOLOGY CO., LTD
Owner/Operator:	Wenzhou Woma Technology Co., Ltd
Owner/Operator Number:	10068908
Establishment Operations:	Foreign Exporter, Manufacturer

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